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**Cincinnati Bell
Telephone®**

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November 17, 1997

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D. C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: **Ex Parte Statement**
CC Docket No. 95-116
Local Number Portability

Dear Ms. Salas:

Today Dennis Hinkel, Roger Werth and Patricia Rupich representing Cincinnati Bell Telephone met with Geraldine Matise, Marian Gordon, Andre Rausch and Erin Duffy of the Network Services Division and Kyle Dixon of the Policy and Program Planning Division of the Common Carrier Bureau to discuss the above referenced proceeding. The attached material regarding the design of the NPAC regions as it relates to the Cincinnati MSA were discussed.

The original and one copy of this letter are being submitted in accordance with Section 1.206(a)(2) of the Commission's Rules.

Sincerely,

Eugene J. Baldrate

cc: Geraldine Matise
Marian Gordon
Andre Rausch
Erin Duffy
Kyle Dixon

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Agenda



- ❖ Introductions
- ❖ Background
- ❖ Status
- ❖ Summary

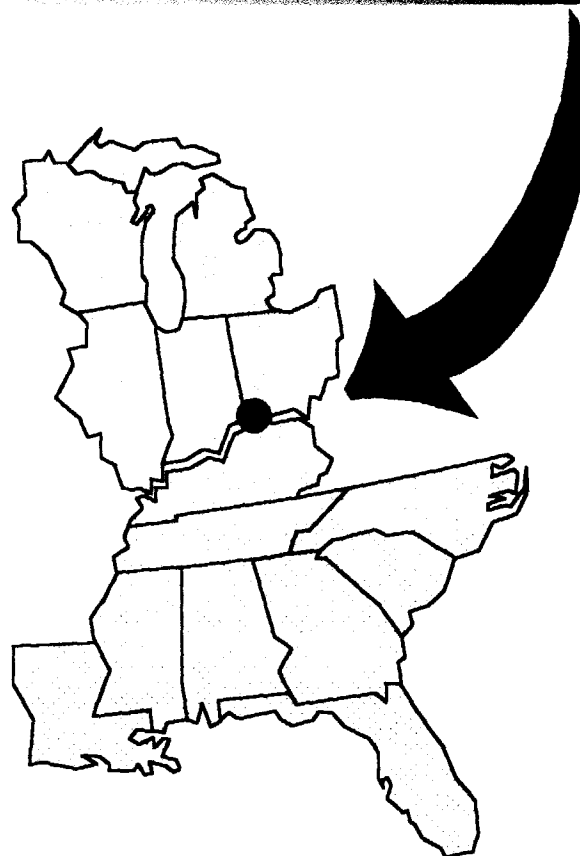


Who we are . . .



- ❖ Cincinnati Bell Telephone operates in Southwestern Ohio, Northern Kentucky and Southeastern Indiana.

- Ø 1 million access lines
- Ø 2,436 sq. miles
- Ø 2800 employees
- Ø 1 LATA, 1 MSA



Background



- ❖ LNPA Working Group Recommendations released May 1, 1997
 - Ø NPAC regions correspond to the original seven RBOC territories
 - Ø CBT filed comments on June 2, 1997 in response to Public Notice regarding the NANC recommendation
- ❖ CBT operating territory spans two NPAC regions with two different vendors
 - Ø Additional cost of \$400,000 for CBT to connect to two NPACs
 - Ø No other LEC identified in exactly the same situation
 - Ø Requested to select a single NPAC region

Background (cont.)



- ❖ Second Report and Order released August 18, 1997
 - Ø Directed NANC to review CBT's request and make recommendation to FCC on or before December 15, 1997
 - Ø NANC specifically charged with addressing whether LECs with contiguous operating areas that overlap more than one number portability database region should be allowed to select a single NPAC
 - Ø Critical factors to consider
 - Technical difficulties for LNP implementation
 - Negative financial consequences for other carriers
- ❖ LNPA Working Group assigned a subcommittee to examine this issue

FCC Direction to NANC



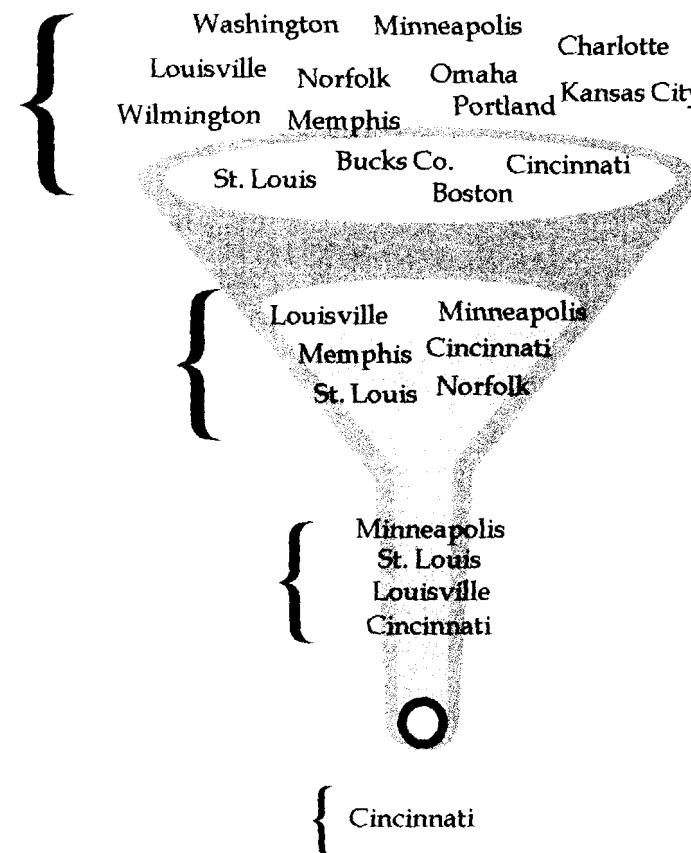
22. We decline, at this time, to grant CBT's request that it be allowed to select one regional Number Portability Administration Center for purposes of fulfilling its number portability responsibilities. **We find that the current record is insufficient to make a finding that granting CBT's request will not raise technical difficulties with respect to local number portability implementation or have negative financial consequences for carriers responsible for conducting the queries necessary to route calls to the proper terminating carrier.** Because the record on this issue is insufficient for us to make a determination whether the benefits to CBT of granting its request outweigh the potential harm to other carriers, we decline to make such a determination at this time. Instead, we direct the NANC to review CBT's request and to make a recommendation to the Commission, on or before December 15, 1997. Specifically, we direct the NANC to address the question of **whether LECs with contiguous operating areas that overlap more than one number portability database region should be allowed to select a single Number Portability Administration Center.**

FCC's Second Report and Order, CC Docket 95-116, Para. 22
(emphasis added)

Current Status



- ❖ Subcommittee determined that the Cincinnati MSA is uniquely impacted
 - 14 MSAs cross state boundaries
 - 6 cross NPAC region boundaries
 - 4 cross NPAC vendor boundaries
 - 1 has same ILEC on both sides of boundary
- ⦿ If the Cincinnati MSA is assigned to a single NPAC region, LNP implementation costs will decrease for many carriers operating in both Ohio and Kentucky portions of the MSA, and no carriers will realize increased costs.
- ⦿ Can be implemented via a simple administrative change.



Current Status (cont.)



- ❖ Any change which reduces costs of LNP implementation without causing any technical difficulties or anticompetitive effects is in the public interest.
- ❖ Assigning the entire Cincinnati MSA to a single NPAC region ensures competitive neutrality and may make it more attractive for CLECs to provide service in northern Kentucky
 - Ø Applies equally to ILEC and CLECs operating in the MSA
 - Ø Any CLEC offering service in both the Ohio and Kentucky portions of the MSA will realize cost savings

Current Status (cont.)



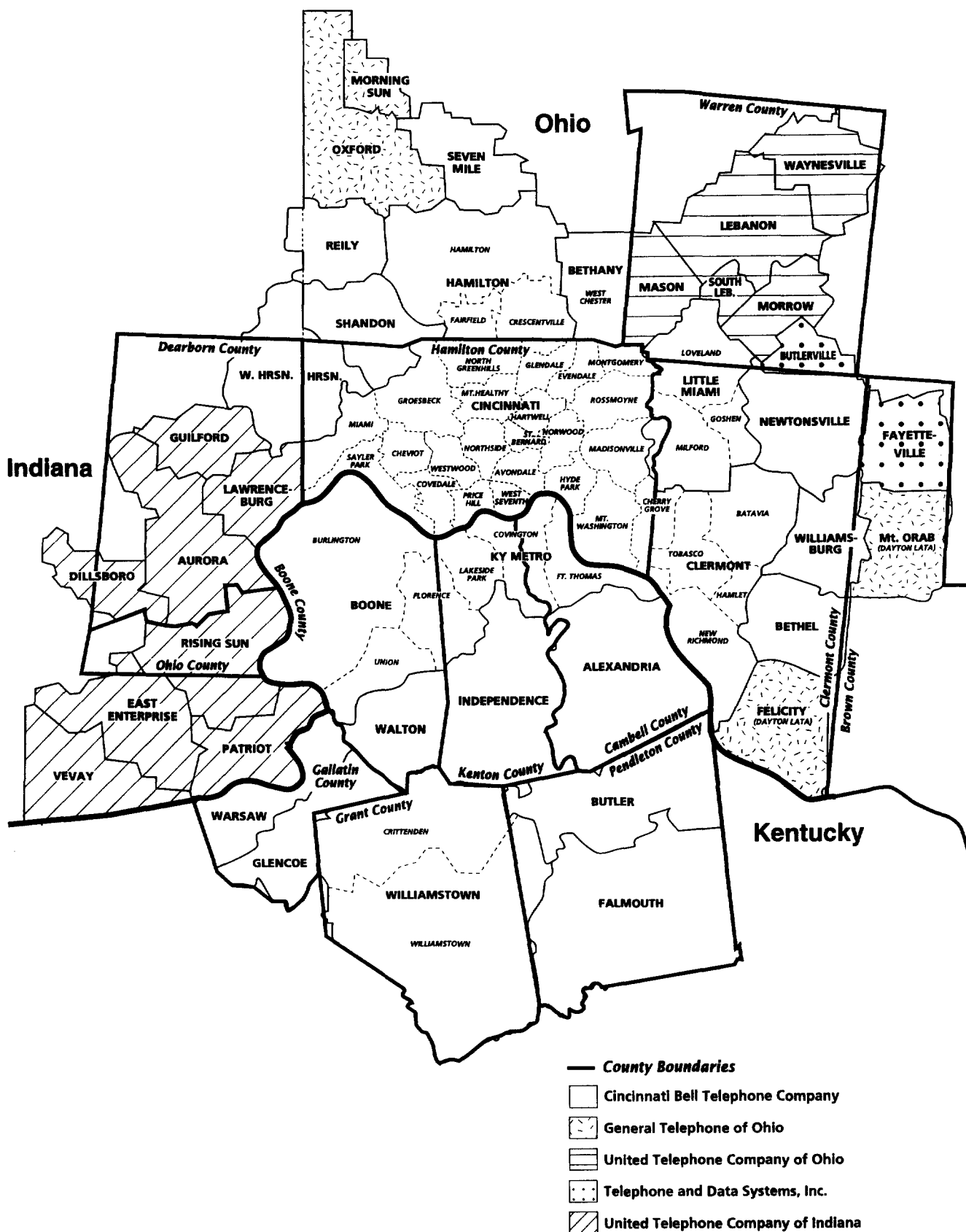
- ❖ LNP Working Group recommended against assigning the Cincinnati MSA to a single region because of concerns about setting a precedent for other providers
- ❖ Those concerns are misplaced
 - Ø Order addresses only LECs
 - Ø Proposal affects only the Cincinnati MSA
 - Ø Issues related to other service providers should be considered independently

Summary



- ❖ Assigning the entire Cincinnati MSA to a single NPAC is clearly in the public interest
 - Ø Administratively simple
 - Ø No technical difficulties
 - Ø Competitively neutral
 - Ø Reduces costs of LNP implementation
 - Ø No adverse impact on any carriers
 - Ø May facilitate entry by new CLECs

Cincinnati LATA



Note:

- Some NXX codes are limited for use with special services, such as paging and cellular service.
- Some NXX codes will not be activated until later in 1996.
- NXX codes in () indicate Local Area Service.
- NXX codes in (*) are used for both EAS and LAS.